
THE
INTERNATIONAL
ARBITRATION
REVIEW

EDITOR
JAMES H CARTER

LAW BUSINESS RESEARCH

THE INTERNATIONAL
ARBITRATION REVIEW

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CONTENTS

| | |
|--|------------|
| Editor's Preface | vii |
| <i>James H Carter</i> | |
| Chapter 1 Investment Arbitration | 1 |
| <i>Stephen Jagusch, Anthony Sinclair and David Stranger-Jones</i> | |
| Chapter 2 Argentina | 18 |
| <i>Alberto DQ Molinario and Maria Laura Velazco</i> | |
| Chapter 3 Austria | 28 |
| <i>Christian W Konrad and Philipp Peters</i> | |
| Chapter 4 Brazil | 40 |
| <i>Luiz Olavo Baptista and Mariana Cattel Gomes Alves</i> | |
| Chapter 5 Bulgaria | 60 |
| <i>Assen Alexiev and Boryana Boteva</i> | |
| Chapter 6 Canada | 71 |
| <i>David R Haigh QC, Louise Novinger Grant, Sonya Morgan and Romeo Rojas</i> | |
| Chapter 7 Chile | 88 |
| <i>Davor Harasić and Karina Cherro</i> | |
| Chapter 8 China | 99 |
| <i>Brenda Horrigan, Felix Hess and Siew Lin Mok</i> | |
| Chapter 9 Cyprus | 114 |
| <i>Alecos Markides</i> | |
| Chapter 10 Czech Republic | 124 |
| <i>Juraj Alexander</i> | |
| Chapter 11 England & Wales | 135 |
| <i>Deborah Ruff and Matthew Page</i> | |
| Chapter 12 Finland | 151 |
| <i>Jan Waselius, Tanja Jussila and Kirsi Peltomäki</i> | |
| Chapter 13 France | 161 |
| <i>Jean-Christophe Honlet, Barton Legum and Anne-Sophie Dufêtre</i> | |

| | |
|------------|---|
| Chapter 14 | Germany 172 <i>Hilmar Raeschke-Kessler</i> |
| Chapter 15 | Greece 186 <i>John C Kyriakides</i> |
| Chapter 16 | Hong Kong 195 <i>Joseph Kwan and Kwok Kit Cheung</i> |
| Chapter 17 | Hungary 204 <i>András Szecskay and György Wellmann Jr</i> |
| Chapter 18 | India 214 <i>Shardul Thacker</i> |
| Chapter 19 | Ireland 226 <i>Klaus Reichert SC</i> |
| Chapter 20 | Israel 235 <i>Shraga Schreck</i> |
| Chapter 21 | Italy 261 <i>Michelangelo Cicogna and Andrew Paton</i> |
| Chapter 22 | Japan 272 <i>Peter Godwin and Raelene Leonard</i> |
| Chapter 23 | Kazakhstan 282 <i>Aigoul Kenjebayeva and Yuliya Mitrofanskaya</i> |
| Chapter 24 | Korea 288 <i>Benjamin Hughes and Beomsu Kim</i> |
| Chapter 25 | Lithuania 298 <i>Ramunas Audzevicius, Tomas Samulevicius and Mantas Juozaitis</i> |
| Chapter 26 | Malaysia 307 <i>Chong Yee Leong</i> |
| Chapter 27 | Mexico 319 <i>Jose Maria Abascal</i> |
| Chapter 28 | Netherlands 332 <i>Jan Willem Bitter and Charlotte de Vink</i> |
| Chapter 29 | Nigeria 345 <i>Babajide Ogundipe and Lateef Omoyemi Akangbe</i> |
| Chapter 30 | Pakistan 347 <i>Mansoor Hassan Khan</i> |

| | | |
|------------|---|-----|
| Chapter 31 | Poland 352 <i>Wojciech Kozłowski, Michał Jochemczak and Katarzyna Kempa</i> | 352 |
| Chapter 32 | Portugal 360 <i>José Carlos Soares Machado and Mariana França Gouveia</i> | 360 |
| Chapter 33 | Romania 367 <i>Tiberiu Csaki</i> | 367 |
| Chapter 34 | Russia 377 <i>Mikhail Ivanov and Inna Manassyan</i> | 377 |
| Chapter 35 | Scotland 389 <i>Lord Dervaird</i> | 389 |
| Chapter 36 | Singapore 396 <i>Chong Yee Leong</i> | 396 |
| Chapter 37 | South Africa 410 <i>Gerhard Rudolph and Darryl Bernstein</i> | 410 |
| Chapter 38 | Spain 423 <i>Diego Saavedra</i> | 423 |
| Chapter 39 | Sweden 438 <i>Hans Bagner and Helena Dandenell</i> | 438 |
| Chapter 40 | Switzerland 443 <i>Martin Wiebecke</i> | 443 |
| Chapter 41 | Turkey 456 <i>Utku Coşar and Margaret Ryan</i> | 456 |
| Chapter 42 | Ukraine 465 <i>Vladimir Zakhvataev and Ulyana Bardyn</i> | 465 |
| Chapter 43 | United Arab Emirates 475 <i>Kaashif Basit</i> | 475 |
| Chapter 44 | United States 485 <i>James H Carter and Suman Chakraborty</i> | 485 |
| Chapter 45 | Venezuela 506 <i>Ramón J Alvins, Elisabeth Eljuri and Pedro Saghy</i> | 506 |
| Appendix 1 | About the Authors 525 | 525 |
| Appendix 2 | Contributing Law Firms' Contact Details 555 | 555 |

EDITOR'S PREFACE

International arbitration is a fast-moving express train, with new awards and court decisions of significance somewhere in the world rushing past every week. Legislatures, too, constantly tinker with or entirely revamp arbitration statutes in one jurisdiction or another. The international arbitration community has created a number of electronic and other publications that follow these developments regularly, requiring many more lawyer hours of reading than was the case a few years ago.

Scholarly arbitration literature follows behind, at a more leisurely pace. But there is a niche to be filled for analytical review of what has occurred in each of the important arbitration jurisdictions during the past year, capturing recent developments but putting them in the context of the jurisdiction's legal arbitration structure and selecting the most important matters for comment. This volume, to which leading arbitration practitioners around the world have made valuable contributions, seeks to fill that space.

The arbitration world is consumed with debate over whether relevant distinctions should be drawn between general international commercial arbitration and international investment arbitration, the procedures and subjects of which are similar but not identical. This volume seeks to provide current information on both of these precincts of international arbitration, treating important investor–state dispute developments in each jurisdiction as a separate but closely related topic.

I thank all of the contributors for their fine work in compiling this volume.

James H Carter
Dewey & LeBoeuf LLP
New York
July 2011

Chapter 23

KAZAKHSTAN

*Aigoul Kenjebayeva and Yuliya Mitrofanskaya**

I INTRODUCTION

i International treaties to which Kazakhstan is a party

Since it became independent in 1991, Kazakhstan has signed a number of international treaties relating to international arbitration, the most important of which are the Convention on the Recognition and Enforcement of Foreign Arbitral Awards of 1958 (‘the New York Convention’), the European Convention on International Commercial Arbitration of 1961; and the Convention on the Settlement of Investment Disputes between States and Nationals of other States of 1965 (‘the ICSID Convention’).

The New York Convention has been in force in Kazakhstan since 18 February 1996, when Kazakhstan acceded to the Convention on the basis of a Presidential Decree; there is a minority view that the New York Convention should have been ratified by Parliament rather than by the president in order to have full force in Kazakhstan. Irrespective of this debate, Kazakh courts apply the New York Convention, and the authors are not aware of any decisions questioning its full force and effect. That being said, it is not impossible that the Kazakh courts of first instance – or higher – may sometimes erroneously apply or fail to apply the New York Convention; however, this is generally corrected on appeal.

Kazakhstan ratified the ICSID Convention on 9 July 2004, and it became effective on 20 July 2004. According to data from the United Nations Conference on Trade and Development (‘UNCTAD’), as of 1 June 2011 Kazakhstan was party to 43 bilateral treaties on the reciprocal promotion and protection of investments with, *inter alia*, Germany (1992), China (1992), the United States (1992), Italy (1994), France (1998), Russia (1998), the United Kingdom (1995) and the Netherlands (2002). The

* Aigoul Kenjebayeva and Yuliya Mitrofanskaya are partners at Salans LLP. The authors gratefully acknowledge the invaluable assistance of Bakhyt Tukulov, an associate at the firm.

vast majority of these treaties provide for the consent of the state to arbitrate disputes before ICSID.

Kazakhstan is also a party to the following international treaties:

- a* the Moscow Convention on Procedures for the Reciprocal Enforcement of Awards Issued by Arbitral, Commercial and Economic Courts within the Members of the CIS of 1998;
- b* the Kiev Convention on the Procedure for Resolving Disputes Related to Business Activities of 1992; and
- c* the Kishinev Convention on Legal Assistance and Legal Relationships in Civil, Family and Criminal Cases of 2002.

ii **Laws relating to international and domestic arbitration**

The main Kazakh statutes relating to arbitral proceedings (both domestic and international) are the following:

- a* The Civil Procedure Code: this governs proceedings before the competent state courts, including enforcement of domestic and foreign arbitral awards. It contains detailed procedures that the courts must follow when considering requests for recognition and enforcement;
- b* The Law of 28 December 2004 on International Commercial Arbitration ('the ICA Law'): this applies if at least one party to the proceedings is a foreign individual or legal entity and the seat of arbitration is in Kazakhstan. The ICA Law also governs enforcement of international arbitral awards rendered in Kazakhstan;
- c* The Law of 28 December 2004 on Arbitration Courts ('the Domestic Arbitration Law'): this governs arbitration proceedings between Kazakhstan individuals or legal entities registered in Kazakhstan, where the seat of the arbitration is in Kazakhstan; and
- d* The Law of 2 April 2010 on Enforcement Proceedings and the Status of Court Bailiffs: this governs the enforcement of court decisions on the recognition and enforcement of arbitral awards.

It is worth mentioning that both the ICA Law and the Domestic Arbitration Law are rather narrow in scope compared to the arbitration laws adopted in most of the jurisdictions considered 'arbitration-friendly'. Under the ICA Law or Domestic Arbitration Law, only disputes arising from civil law contracts can be submitted to arbitration, while disputes arising from non-contractual relations are not arbitrable. Pursuant to the Domestic Arbitration Law, certain types of domestic disputes (i.e., disputes between Kazakh residents, cannot be submitted to arbitration). These non-arbitrable domestic disputes include disputes involving the state, state entities and third parties, as well as disputes arising from contracts for the delivery of goods and services by natural monopolies, and disputes involving entities qualifying as dominant market entities.¹ There is no such prohibition in the ICA Law. In addition, awards issued by tribunals regarding domestic

¹ 'Dominant market entity' refers to a notion under Kazakh competition law, which encompasses, *inter alia*, any legal entity with at least 35 per cent share in a certain market.

disputes may be reviewed on the merits by the competent courts. Non-conformity of the award to Kazakh law is a ground for the setting aside of the award. Thus, rules applicable to arbitration cases involving Kazakh entities from both sides are different from those involving foreign individuals or legal entities, both from an arbitrability and enforceability point of view.

Since Kazakhstan is a civil law country, courts are generally not bound by judgments of other courts. Although a certain volume of judgments is published on the official website of the Supreme Court,² publicly available information is too scarce to identify judicial practice with respect to arbitration. As a result, it is very difficult to predict the outcome of court proceedings relating to arbitration.

Finally, pursuant to the Code of Civil Procedure, the following types of disputes fall within the exclusive competence of the courts of Kazakhstan:

- a* disputes related to real property located in Kazakhstan;
- b* disputes related to divorce, if both parties reside in Kazakhstan;
- c* disputes related to transportation agreements;
- d* disputes related to the violation of constitutional rights;
- e* disputes related to the determination of a legally significant fact (e.g., title to property) where the plaintiff is domiciled in Kazakhstan or the events occurred in Kazakhstan;
- f* declaration of loss and restoration of rights to a security, provided that the issuer of such security is a Kazakh citizen or a legal entity established under the laws of Kazakhstan; and
- g* challenges against actions of a Kazakh notary or state institution.

Thus, when entering into contracts in respect of any of the foregoing matters, it should be borne in mind that it will not be possible to submit to arbitration any dispute related to these matters.

iii Structure of Kazakh courts

Following amendments to the Code of Civil Procedure that came into effect on 1 January 2010, Kazakhstan's judiciary is divided into four levels:

- a* district court;
- b* appellate panel of a regional court;
- c* cassation panel of a regional court; and
- d* the Supreme Court.

District courts normally review cases within two months of their initiation. With respect to certain complex cases that require comprehensive preparation, court proceedings can be extended for a month. An appeal or cassation appeal must be submitted within 15 days from the date of receipt of the judgment. If no appeal or cassation appeal is submitted within this period and, provided that such period of time is not extended or

2 The official website of the Supreme Court of the Republic of Kazakhstan contains over 400,000 judgments. The vast majority is available in Russian; see www.supcourt.kz.

restored, the judgment or resolution enters into force on the 16th day following receipt of the judgment or resolution.

Appellate and cassation courts should each review cases within one month. The judgment takes force after the review by the cassation panel of a regional court; resolutions issued by the cassation panel are deemed final and can be enforced immediately. Thus, it takes approximately four to six months to obtain a final judgment.

Resolutions of the cassation panel can be appealed to the Supreme Court in the supervisory procedure, provided that the Supreme Court grants such motion. Generally, supervisory motions can be filed with the Supreme Court during the year following the resolution's entry into force.

iv Main arbitration institutions in Kazakhstan

There are several institutions in Kazakhstan involved in private dispute resolution, in particular arbitration, the most prominent ones being the following:

- a* Kazakhstan International Arbitrage;³
- b* Court of International Arbitration at the Kazakhstan Chamber of Commerce;⁴
- c* International Arbitration Court ('IUS'); and
- d* Eurasian Centre for Mediation.

II THE YEAR IN REVIEW

i Developments affecting international arbitration

On 28 January 2011, the Parliament of Kazakhstan adopted a law 'On Mediation' ('the Mediation Law'). The Mediation Law represents a substantial shift towards promoting alternative means of dispute resolution ('ADR'). It is worth mentioning that prior to the Mediation Law, Kazakh laws did not specifically govern this type of ADR, as arbitration was seen as the primary means of ADR.

The scope of disputes that may be submitted to mediation is broad. According to the Mediation Law, disputes arising from civil, labour, family, and other relations involving individuals or legal entities can be submitted to mediation; however, mediation is not permitted when a party in dispute is a state body. Mediation is also not permitted with respect to disputes arising from criminal law, unless the crime in question has little or medium gravity.

The Mediation Law permits parties to enter into an agreement on mediation both before and after the dispute has arisen. The parties in dispute may resort to mediation before or in the course of litigation. The Mediation Law permits parties to suspend litigation. It is unclear, however, how an ongoing civil litigation could be suspended; the Civil Procedure Code has not yet been amended to permit courts to suspend the proceeding in the event of the parties' consent to mediate a dispute.

The Mediation Law sets out specific deadlines for consummation of the mediation: 30 days (from the date of mediation agreement) for mediation occurring in the course

3 www.arbitrage.kz.

4 www.cci.kz.

of litigation, with an option to extend the time period by another 30 days (i.e., no more than 60 days in total). Any other mediation shall be completed within 60 days, with an option to extend the time period by 30 days (i.e., no more than 90 days in total). Parties to a mediation agreement are free to establish specific time frames for the mediation, select an appointment mechanism, language and other procedural aspects.

The Mediation Law sets out certain specific qualification requirements for professional mediators (e.g., higher education, obtaining a certificate of mediator). The Mediation Law distinguishes between non-professional and professional mediators. Individuals aged 40 years or more (subject to additional requirements) may act as non-professional mediators. The Mediation Law does not clarify the rationale for distinguishing between professional and non-professional mediators. It could only be presumed that the scope of disputes that may be reviewed by non-professional mediators would probably be limited. As a general rule, professional mediators shall be selected from the list of mediators registered with an organisation of mediators. Either party may refuse to continue mediation at any stage. If the mediation is successful, the mediation shall be embodied in a settlement agreement.

The Mediation Law will enter into force on 5 August 2011.

ii Investor–state disputes

As of 15 May 2011, ICSID listed on its website the following international investment arbitrations against Kazakhstan:

- a Caratube International Oil Company LLP v. Kazakhstan;*⁵
- b KT Asia Investment Group BV v. Kazakhstan;*⁶
- c AES Corporation and Tau Power BV v. Republic of Kazakhstan;*⁷ and
- d Türkiye Petrolleri Anonim Ortaklığı v. Republic of Kazakhstan.*⁸

According to the ICSID website, the following investment disputes involving Kazakhstan have already been decided:

- a Enrho St Limited v. Republic of Kazakhstan;*⁹
- b AIG Capital Partners, Inc and CJSC Tema Real Estate Company v. Republic of Kazakhstan;*¹⁰
- c Rumeli Telekom AS and Telsim Mobil Telekomunikasyon Hizmetleri AS v. Republic of Kazakhstan;*¹¹ and
- d Liman Caspian Oil BV and NCL Dutch Investment BV v. Republic of Kazakhstan.*¹²

5 ICSID Case No. ARB/08/12.

6 ICSID Case No. ARB/09/8.

7 ICSID Case No. ARB/10/16.

8 ICSID Case No. ARB/11/2.

9 ICSID Case No. ARB/02/11.

10 ICSID Case No. ARB/01/6.

11 ICSID Case No. ARB/05/16.

12 ICSID Case No. ARB/07/14.

The authors are not aware of any investment treaty arbitration proceedings under the UNCITRAL Rules of Arbitration or other *ad hoc* arbitrations that would involve Kazakhstan. Such proceedings, when they exist, are often kept confidential.

III OUTLOOK AND CONCLUSIONS

As indicated, *supra*, pursuant to the Domestic Arbitration Law, certain types of domestic disputes involving the state, state entities, monopolies or entities having a dominant position are outside the competence of arbitral tribunals. In other words, Kazakh residents cannot arbitrate disputes involving any of the above-mentioned entities. If such disputes involve an international element, however, they can be submitted to arbitration; this means that foreign parties may enter into arbitration agreements with the state, state entities, monopolies or entities having a dominant position. Besides, as discussed *supra*, awards issued in domestic arbitrations (i.e., between Kazakh residents) can be reviewed on their merits by state courts, while the grounds for reviewing an award in an international arbitration are much more limited. There has been considerable debate on whether such differences between domestic and international arbitration are appropriate.

Another noteworthy point is that both the ICA Law and the Domestic Arbitration Law are limited only to 'disputes arising from commercial contracts'. Thus, arbitral tribunals in Kazakhstan are prohibited from resolving non-contractual commercial disputes. Such a restriction does not exist under the UNCITRAL Model Law (which expressly provides that it covers commercial disputes of both a contractual and non-contractual nature) or the laws of arbitration-friendly jurisdictions.

Although, as previously mentioned, several initiatives to amend the legislation have already been proposed, the debate is ongoing and issues highlighted in this chapter will likely be addressed in the near future.

Kazakh laws, including those relating to international arbitration, are constantly changing. In this environment, the development of well-established judicial practice relating to the application of arbitration laws and international treaties is difficult. Thus, irregular application of the law by state courts is not uncommon. Although higher courts generally correct errors, which gives some comfort to the parties to arbitration, the outcome of the proceedings is often quite difficult to predict even in relatively simple matters. Furthermore, relatively simple cases may easily become costly and protracted.

Nevertheless, as the latest developments demonstrate, the general policy of the Kazakh government and judiciary is to promote alternative dispute resolution as a means of dispute resolution and to increase trust in such mechanisms.

Appendix 1

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Aigoul Kenjebayeva is the managing partner of the Almaty office of Salans LLP. Ms Kenjebayeva's impeccable reputation is built on her proven record providing practical and effective advice to investors on their way to success in Kazakhstan and in defending their interests against the state and third parties. Ms Aigoul Kenjebayeva is ranked by *Chambers Global* and *PLC Which Lawyer?* as the leading specialist among individuals practising law in Kazakhstan in the areas of natural resources and corporate/commercial. Aigoul's particular areas of specialisation are gathered from over 30 years as a practising lawyer and include energy, natural resources, environmental protection, M&A and general corporate matters.

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